

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ASHLEY SITES & GABRIEL YIBALE as	:	CIVIL ACTION
Administrators & Administrators	:	NO.: 1:22-cv-10667-JMF
<i>Ad Prosequendum</i> on behalf of the	:	
ESTATE OF ELLIANA DIEM YIBALE,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
THE LAUNDRESS, LLC, and	:	NOTICE
ABC CORP. #1-50 (fictitious names),	:	OF MOTION FOR ORDER
	:	COMPROMISING ACTION
Defendants.	:	
	:	

PLEASE TAKE NOTICE that upon the annexed Plaintiff's Statement of Material Facts Pursuant to Local Civil Rule 56.1(a), Dylan T. Hastings, Esquire In Support of Motion for Order Compromising Action, Affidavit of Ashley Sites In Support of Motion for Order Compromising Action and Plaintiffs' Memorandum of Law In Support of Motion for Compromise Order and all the pleadings heretofore had herein, the undersigned will move this Court at 40 Foley Square, Courtroom 1105, New York, NY 10007 on May 2, 2025 at 9:30 AM, or as soon thereafter as Counsel may be heard, for an Order pursuant to Pursuant to Rule 83.2(b) of the Local Civil Rules for the Southern and Eastern Districts of New York and the New York Estates, Powers and Trusts Law § 5-4.6(a):

1. approving the compromise and settlement of this case in the amount of [REDACTED]; and
2. authorizing Ashley Sites, as the Administrator of the Estate of Elliana Diem Yibale, to execute and deliver any and all documents necessary to effectuate this settlement, together with general releases, stipulations of discontinuance and whatever other documents that may be necessary; and

3. directing the defendants to pay the settlement amount of [REDACTED] to Ashely Sites as Administrator of the Estate approving the attorneys' fee of [REDACTED]; and
4. approving the attorneys' expenses in the amount of [REDACTED]; and
5. authorizing Williams Cedar LLC to disburse from their attorney escrow account the amount of [REDACTED], representing the sum of the attorneys' fee and the attorneys' expenses, upon filing with this Court proof of the filing of a petition for allocation and distribution of the assets on behalf of the decedent's Estate with the Register of Wills for Roanoke County in the State of Virginia, where Letters of Administration were issued to Ashely Sites on March 1, 2023; and
6. granting any such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that opposing affidavits and answering memoranda shall be served within fourteen days after service of the moving papers, pursuant to Local Civil Rule 6.1(b)(2).

Dated: New York, New York

April 18, 2025

Respectfully submitted,

WILLIAMS CEDAR LLC

/s/ Dylan T. Hastings
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